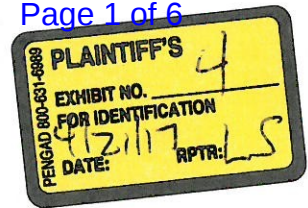




THOMPSON
BUKHER LLP
From Concept Onward

369 Lexington Avenue | Suite 327 | New York, NY 10017 | 212.920.6050



Benjamin S. Thompson
tel 646.770.1097 | fax 646.924.3040
bthompson@thomplegal.com

September 18, 2014

VIA FIRST CLASS MAIL

Universal Music Group, Inc.
P.O. Box 3982
North Hollywood, CA 91609
Attention: Legal Notices

Re: Unauthorized Use of Photographic Works

To Whom It May Concern:

This firm represents Mr. Glen Craig in the use and license of his photographs and copyrights therein. I write to discuss the unauthorized use by Universal Music Group, Inc. ("UMG") of certain copyrights owned by Mr. Craig. Kindly direct all future correspondence regarding this matter to my attention.

Mr. Craig is the registered owner of the copyright in and to the photos, BB King Star Guitar Photo 1969, BB King Color 1969 Front, and BB King Color 1969 Back (the "Photos"), copies of which are annexed to this letter. As you may be aware, Mr. Craig is a professional photographer with an accomplished career, having many of his photographs used commercially all over the world for decades.

We were recently informed of UMG's unauthorized use of the Photos in at least fifty seven (57) instances. The following is a non-exhaustive list of Mr. Craig's works that are being published by UMG as of August 1, 2014:

- BB King Star Guitar Photo 1969, amazon.com, Best of B.B. King & Bobby Bland
- BB King Star Guitar Photo 1969, barnesandnoble.com, Best of B.B. King & Bobby Bland
- BB King Star Guitar Photo 1969, spotify.com, Best of B.B. King & Bobby Bland
- BB King Star Guitar Photo 1969, iTunes Music Store, Best of B.B. King & Bobby Bland
- BB King Star Guitar Photo 1969, last.fm, Best of B.B. King & Bobby Bland
- BB King Star Guitar Photo 1969, amazon.com, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).

GC00057

- BB King Star Guitar Photo 1969, barnesandnoble.com, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, facebook.com, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, iTunes Music Store, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, universalmusic.com, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, myspace.com, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, spotify.com, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, last.fm, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, target.com, Ladies and Gentlemen... Mr. B.B. King (4 CD Box Set).
- BB King Star Guitar Photo 1969, amazon.com, Ladies and Gentlemen... Mr. B.B. King (10 CD Box Set).
- BB King Star Guitar Photo 1969, facebook.com, Ladies and Gentlemen... Mr. B.B. King (10 CD Box Set).
- BB King Star Guitar Photo 1969, spotify.com, Ladies and Gentlemen... Mr. B.B. King (10 CD Box Set).
- BB King Star Guitar Photo 1969, myspace.com, Ladies and Gentlemen... Mr. B.B. King (10 CD Box Set).
- BB King Star Guitar Photo 1969, universalmusic.com, Ladies and Gentlemen... Mr. B.B. King (10 CD Box Set).
- BB King Star Guitar Photo 1969, last.fm, Ladies and Gentlemen... Mr. B.B. King (10 CD Box Set).
- BB King Star Guitar Photo 1969, amazon.com, Why I Sing the Blues (1995).
- BB King Star Guitar Photo 1969, barnesandnoble.com, Why I Sing the Blues (1995).

- BB King Star Guitar Photo 1969, iTunes Music Store, Why I Sing the Blues (1995).
- BB King Star Guitar Photo 1969, spotify.com, Why I Sing the Blues (1995).
- BB King Star Guitar Photo 1969, last.fm, Why I Sing the Blues (1995).
- BB King Star Guitar Photo 1969, amazon.com, Why I Sing the Blues (2007).
- BB King Star Guitar Photo 1969, barnesandnoble.com, Why I Sing the Blues (2007).
- BB King Star Guitar Photo 1969, iTunes Music Store, Why I Sing the Blues (2007).
- BB King Star Guitar Photo 1969, spotify.com, Why I Sing the Blues (2007).
- BB King Star Guitar Photo 1969, last.fm, Why I Sing the Blues (2007).
- BB King Star Guitar Photo 1969, amazon.com, B.B. King Ultimate Collection
- BB King Star Guitar Photo 1969, barnesandnoble.com, B.B. King Ultimate Collection
- BB King Star Guitar Photo 1969, iTunes Music Store, B.B. King Ultimate Collection
- BB King Star Guitar Photo 1969, spotify.com, B.B. King Ultimate Collection
- BB King Star Guitar Photo 1969, last.fm, B.B. King Ultimate Collection
- BB King Star Guitar Photo 1969, universalmusic.com/shop (link to bbking.com)
- BB King Color 1969 Front, econgroupinc.net, B.B. King 2013 Black Tour t-Shirt (Live in Japan)
- BB King Color 1969 Front, amazon.com, B.B. King Live in Japan
- BB King Color 1969 Front, barnesandnoble.com, B.B. King Live in Japan
- BB King Color 1969 Front, iTunes Music Store, B.B. King Live in Japan
- BB King Color 1969 Front, bbking.com, B.B. King Live in Japan
- BB King Color 1969 Front, spotify.com, B.B. King Live in Japan
- BB King Color 1969 Front, last.fm, B.B. King Live in Japan

- BB King Color 1969 Front, amazon.com, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Front, barnesandnoble.com, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Front, iTunes Music Store, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Front, bbking.com, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Front, spotify.com, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Front, last.fm, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Back, amazon.com, B.B. King Live in Japan
- BB King Color 1969 Back, barnesandnoble.com, B.B. King Live in Japan
- BB King Color 1969 Back, iTunes Music Store, B.B. King Live in Japan
- BB King Color 1969 Back, bbking.com, B.B. King Live in Japan
- BB King Color 1969 Back, amazon.com, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Back, barnesandnoble.com, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Back, iTunes Music Store, B.B. King Live in Japan (Remastered)
- BB King Color 1969 Back, bbking.com, B.B. King Live in Japan (Remastered)

While we appreciate that the Photos were selected for use in your products, we must enforce the rights of Mr. Craig, and demand that you cease and desist from all use, sale, distribution, and exploitation of the Photos and any other works by Mr. Craig or in which he holds any copyright interest, and which such works are being used without the express, written consent of Mr. Craig. The Photos are not joint works, so there are no other authors who could have granted you permission; and Mr. Craig has never transferred or licensed the rights in and to the Photos in a way that could be assigned, sold, or transferred.

Be advised that the unauthorized use of the Photos constitutes copyright infringement under U.S. copyright law, Title 17 of the United States Code (the "Copyright Act"). Such infringement can subject you to significant monetary damages for the unauthorized use of the Photos, whether or not such unauthorized use was intentional.

Additionally, we seek remuneration for the unauthorized use that has already occurred, and request that you contact my office no later than Friday, October 3, 2014, 5:00 p.m. EDT. Failure

to do so will result in immediate legal action being filed against you in the United States District Court of the Southern District of New York, seeking (i) injunctive relief prohibiting your use of the Photos; (ii) damages for prior unauthorized use; (iii) statutory damages pursuant to the Copyright Act, which can provide up to \$150,000 per infringement if found to be willful; (iv) attorneys' fees and court costs relating to this matter; and (v) any other relief that the court deems just and proper.

We are hopeful that we can resolve this amicably, and that you or your counsel responds to this letter in the timeframe provided above.

The foregoing is not intended as a complete recitation of all of the facts and circumstances in this matter, and is written without prejudice to any of our client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

Sincerely,

A handwritten signature in black ink, appearing to be "B. S. Thompson", written in a cursive style.

Benjamin S. Thompson

BB King Star Guitar Photo 1969:

